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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
MOBILEMEDIA CORPORATION, et. al. ) WT Docket No. 97-115  
 )  
Applicant for Authorizations and Licensee )  
of Certain Stations in Various Services )  
 )  
To: The Commission )

COMMENTS OF INTERVENOR SECURED LENDERS IN SUPPORT OF  
REQUEST FOR CLARIFICATION

The Chase Manhattan Bank, as agent for the secured lenders to MobileMedia Communications, Inc. ("Secured Lenders"), respectfully files these comments in support of the Request for Clarification filed by MobileMedia Corporation and its subsidiaries, debtors-in-possession ("MobileMedia").<sup>1/</sup> The Secured Lenders support MobileMedia's request for clarification that the requirements of paragraph 17 of the *Stay Order*<sup>2/</sup> apply only with respect to the four individuals identified in the *Reconsideration Order* as potential wrongdoers.<sup>3/</sup>

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<sup>1/</sup> Secured Lenders have been granted leave to intervene and have been made a party to this proceeding. FCC 97-284 (released August 8, 1997), at ¶ 11.

<sup>2/</sup> FCC 97-197 (released June 6, 1997).

<sup>3/</sup> FCC 97-284 (released August 8, 1997), ¶ 8.

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As MobileMedia has demonstrated in its Request, no logical basis remains to apply the requirements of paragraph 17 to the individuals whose names have been removed from the list compiled in accordance with paragraph 18. Indeed, until the request for clarification was filed, the Agent for the Secured Lenders had assumed that the Reconsideration Order addressed and modified both paragraphs 17 and 18. Significant in this regard was the fact that the petitions filed by Witsaman, Hilson and Pittsman expressly sought relief from both paragraphs.

As a matter of fairness, and on the basis of the Commission's own legal precedents, it would be entirely inappropriate if none of MobileMedia's current top management could continue to work for the successor to the company after a sale or a stand-alone reorganization when the Reconsideration Order makes clear that the allegations against MobileMedia are not sufficient to raise any substantial and material question as to the qualifications of any such individuals. Moreover, the Secured Lenders are concerned that any uncertainty as to whether the current members of management could continue to be employed by the entity that emerges from MobileMedia's Chapter 11 could have an adverse effect both on the company's ongoing sale efforts and the formulation of a stand-alone plan. There is simply no reason that such individuals could be employed by other Commission licensees but not by MobileMedia's successor in interest.

The Secured Lenders' recovery on their loans to MobileMedia is dependent on a successful sale of MobileMedia or a viable stand-alone plan. Lack of clarity as to the scope of paragraph 17 could adversely affect either alternative, thereby causing harm to the interests of the Secured Lenders and other innocent creditors.

The Secured Lenders believe that MobileMedia has presented compelling arguments that paragraph 17 should be clarified in a manner consistent with the Reconsideration Order's proper clarification of paragraph 18. Accordingly, the Secured Lenders support MobileMedia's request for clarification and urge the Commission to issue an order limiting the scope of paragraph 17 to the four identified potential wrongdoers covered by paragraph 18.

Respectfully submitted,



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September 10, 1997

CERTIFICATE OF SERVICE

I, William R. Richardson, Jr., hereby certify that on this 10th day of September 1997, I caused copies of the foregoing Comments of Intervenor Secured Lenders in Support of Request for Clarification to be hand-delivered, or sent by first-class mail, postage pre-paid,\* to the following:

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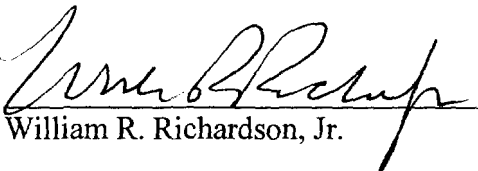
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